

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**TALEL SALEM, et al,**

Plaintiffs,

v.

**METNA CO. et al.,**

Defendants.

CASE NO.: 1:19-cv-220

Hon. Hala Y. Jarbou

Magistrate Sally J. Berens

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**Nakisha Chaney (P65066)**

Salvatore Prescott & Porter  
Attorney for Plaintiffs  
105 East Main Street  
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**Lisa C. Ward (P38933)**

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Metna Co.  
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**DEFENDANT'S OFFER OF JUDGMENT**


Pursuant to Fed. R. Civ. P. 68, Defendants, Dr. Soroushian and Metna Co., make the following offer of judgment to Plaintiffs, Talal Salem and Salina Ramli:

1. Defendants will pay a total of \$90,000.00 to Plaintiffs, with \$45,000.00 for Ms. Ramli and \$45,000.00 for Mr. Salem.
2. The total of \$90,000.00 includes **all costs and attorney fees** that Plaintiffs have incurred in this case.
3. The payment of \$90,000.00 is for a full and complete settlement of all of the claims or causes of action in this case, whether those claims are based on federal or state law.

As set forth in Rule 68, Plaintiffs have 14 days to either accept or reject Defendants' offer of judgment.

Respectfully submitted,

Dated: 05-04-21

  
Lisa C. Ward (P38933)  
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Metna Co.  
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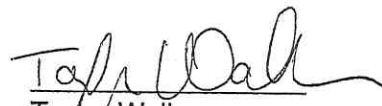
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**PROOF OF SERVICE**

I, Taylor Wallace, hereby certify that I served a copy of Defendants' Offer Of Judgment on May 4, 2021, via first class mail, return receipt requested, on Nakisha Chaney, Counsel for Plaintiffs.

Dated: 05-04-21

  
Taylor Wallace  
Legal Assistant